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January 6, 2020

**Via ECF**

Honorable James L. Garrity, U.S.B.J.  
United States Bankruptcy Court  
One Bowling Green  
New York, NY 10004-1408

Re: Penny Ann Bradley  
Case No. 18-10122-jlg  
**Hearing Date: January 8, 2020**

Dear Judge Garrity:

As Your Honor will recall, this firm represents NSM82 LLC in the above-referenced matter. I am writing in response to the January 3, 2020 letter to Your Honor from the Debtor's special counsel, Joseph Maniscalco, Esq., regarding the status of the various pending matters scheduled to be heard on January 8, 2020. Among those matters is the pending motion of NSM82 LLC for the appointment of a Chapter 11 trustee (the "Trustee Motion"). In his letter to Your Honor, Mr. Maniscalco mistakenly represented that I consented to adjourn the Trustee Motion. In fact, given that one of the primary grounds for the Trustee Motion is the large amount of cash flowing in and out of the Debtor's wholly-owned business, Bistro Shop LLC, post-petition, which has still not been explained, NSM82 LLC prefers to move forward with the Trustee Motion on January 8. We will abide Your Honor's decision on the scheduling of all pending matters but wanted to bring this issue to your attention.

Thank you for Your Honor's attention to this matter.

Respectfully,

*/s/ Kenneth L. Baum*

Kenneth L. Baum